



South Coast
Air Quality Management District

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Office of the Acting Executive Officer

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August 4, 2016

The Honorable Ted W. Lieu
United States Representative
United States House of Representatives
415 Cannon House Office Building
Washington, DC 20515

Dear Congressman Lieu:

Thank you for your July 20, 2016 letter expressing your concerns about South Coast Air Quality Management District's study on the availability of alternative alkylation technologies to Modified Hydrofluoric (MHF) acid. As I understand, you are concerned that the study focuses on evaluating alternative processes to MHF but does not include an analysis on the safety of MHF as is currently being used at the Torrance Refinery nor does it evaluate the adequacy of on-site mitigation measures in the event of a major leak.

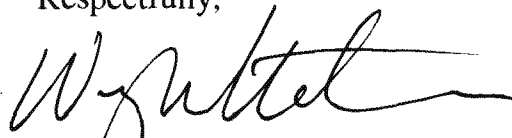
Our study is of limited scope and focuses on exploring commercially viable alternatives to the MHF based alkylation process. The study was initiated to respond promptly to concerns expressed by the community relative to MHF and also help facilitate future policy discussions. Our goal is that the study will provide an objective evaluation of commercially available and practical feasibility of various alkylation processes and the potential hazards related to each identified process, resulting in a list of viable options for all stakeholders to consider. The SCAQMD study, as you pointed out, is not focused on the safety aspects of the Torrance refinery nor does it evaluate the effectiveness of current on-site mitigation measures. We agree that safety issues are important and the adequacy of current on-site mitigation programs deserve a thorough evaluation. Other agencies, however, and as described below, are much better positioned to evaluate safety issues relative to MHF use at refineries, and this work is in progress.

As you may know, facilities that use extremely hazardous substances (such as MHF) are required under the 1990 Clean Air Act amendments to develop and submit to United States Environmental Protection Agency (USEPA) a Risk Management Plan (RMP), which must be updated every five years. RMPs, being publically available, foster communication and awareness to improve safety. EPA Region IX is currently in the process of conducting a detailed review of RMPs involving the use of both Hydrofluoric (HF) and Sulfuric acids in alkylation processes in the South Coast Basin. As the agency with direct authority over the RMPs, we believe that USEPA is the most appropriate agency to review and evaluate the potential hazards related to specific processes and the adequacy of preventative measures employed at each refinery. The Chemical Safety Board (CSB) is also conducting its own independent study addressing whether current practices adequately address safety concerns. The Chemical Safety Board is among the best equipped agencies in providing guidance on safety, including best safe practices for industrial processes.

Your and our concerns about safety are being addressed through the on-going review by the CSB and USEPA, two separate, highly qualified and credible agencies. We believe that addressing safety issues relative to MHF and adequacy of on-site mitigation measures in our current SCAQMD study would be duplicative and not provide additional useful information. Rather, our study has been designed to identify potential alternatives to MHF and further the discussion resulting from the safety reviews being conducted by CSB and USEPA.

Thank you again for sharing your concerns. Please feel free to contact me if you have any additional questions or comments.

Respectfully,



Wayne Nastri
Acting Executive Officer

WN/drw

cc: Deborah Jordan, US EPA Region 9
Rep Maxine Waters
Asmb David Hadley
Supervisor Don Knabe
Torrance City Council
SCAQMD Board Members